

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Snail Mobile LLC</b>	)	
	)	
<b>Application for authority pursuant to Section 214 of the Communications Act of 1934, as amended, for global authority to operate as an international facilities-based and resale carrier</b>	)	<b>File No.: ITC-214_____</b>

The following information is submitted, as required by 47 CFR § 63 of the Commission’s Rules, in support of Snail Mobile LLC’s request for authorization:

**Attachment 1**

**# 9. The applicant request streamlined processing pursuant to 47 C.F.R. Section 63.12. Applicant qualifies for streamlined processing because:**

The Applicant does qualify for streamlined processing because it is not a foreign carrier and it does not control a foreign carrier. Snail Mobile, LLC is a California limited liability company. It is 100% owned by its sole member, Mr. Shi Hai, a Chinese citizen. Snail Mobile, LLC does not control a foreign carrier in any country. Snail Mobile’s sole member, Shi Hai, holds a 58.35% equity interest in Suzhou Snail Digital Technology Co., Ltd. (“Snail Digital”), which is a Chinese corporation that provides MVNO services and develops online video games.

**# 10. If applying for authority to provide switched services over private lines pursuant to Section 63.16, provide the required showing in Attachment 1.**

Not Applicable. Applicant does not seek authority to provide switched services over private lines to a country for which the Commission has not previously authorized the provision of switched services over private lines.

**# 11. If the applicant is a foreign carrier, or is affiliated (as defined in 47 C.F.R. Section 63.09(e)) with a foreign carrier, provide in Attachment 1 the information and certifications required by Section 63.18(i) through (m).**

- (i) The Applicant certifies that it is 100% owned by its sole member, Mr. Shi Hai, a Chinese citizen. It certifies that Shi Hai also holds a 58.35% equity interest in Suzhou Snail Digital Technology Co., Ltd. (“Snail Digital”), which is a Chinese corporation that provides MVNO services and develops online video games. Snail Digital’s principal place of

business is in Suzhou, China, and Snail Digital also owns 100% of Snail Games USA, Inc., a California online video gaming corporation.

- (j) (1)The Applicant certifies that it is not a foreign carrier in China. (2) It certifies it does not control any foreign carrier. (3) It certifies that its sole owner, Mr. Shi Hai, owns also holds a 58.35% equity interest in Suzhou Snail Digital Technology Co., Ltd. (“Snail Digital”), which is a Chinese corporation that provides MVNO services and develops online video games. (4) Not applicable.
- (k) The Applicant certifies that China is a member of the World Trade Organization
- (l) The Applicant certifies that its affiliate is not a monopoly provider of communications services in China and that the Applicant seeks to be regulated as non-dominant. Applicant certifies that it owns no interest in a foreign affiliate. Therefore, the Applicant request that it presumptively be classified as non-dominant. Applicant certifies it will file the quarterly traffic reports as required by 47 C.F.R. § 43.61(c).
- (m)The Applicant certifies that it qualifies to be regulated as non-dominant for the provision of its particular international telecommunications services to China and other international points because of the facts stated herein.

**#12. Does the applicant seek authority to provide service to any destination described in paragraphs (1) through (4) of Section 63.18(j)? If yes, list those destinations in Attachment 1 as a response to question 12.**

Yes. The Applicant is requesting International Authority to provide International Facilities–Based and Resold Services to All International Points, including China, except those excluded by the Commission.

**# 13. Does the applicant seek authority to provide service to any destinations other than those listed in response to question 12 where it has an affiliation with a foreign carrier? If yes, list those destinations in Attachment 1.**

No. The Applicant does not seek authority to provide service to any destinations other than those listed in response to question 12.